



# ***COMMONWEALTH of VIRGINIA***

## ***DEPARTMENT OF ENVIRONMENTAL QUALITY***

### **TIDEWATER REGIONAL OFFICE**

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David K. Paylor  
Director

### **STATEMENT OF LEGAL AND FACTUAL BASIS**

Perdue Farms Incorporated  
22520 Lankford Highway  
Accomac, Virginia  
Permit No. TRO-40483

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Perdue Farms Incorporated has applied for a Title V Operating Permit for its Accomac, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:	<u>Yen T. Bao</u> (757) 518-2195	Date:	<u>February 2, 2011</u>
Air Permit Manager:	<u>Jane A. Workman</u>	Date:	<u>February 2, 2011</u>
Acting Regional Director:	<u>Maria R. Nold</u>	Date:	<u>February 2, 2011</u>

## **I. FACILITY INFORMATION**

### Permittee

Perdue Farms Incorporated  
22520 Lankford Highway  
Accomac, Virginia 23301

### Facility

Perdue Farms Incorporated  
22520 Lankford Highway  
Accomac, Virginia 23301

County-Plant Identification Number: 51-001-00010

### **A. SOURCE DESCRIPTION**

NAICS 311999 – miscellaneous food manufacturing (poultry slaughtering and processing)  
NAICS 311613 – rendering and meat byproduct processing

Facility processes live poultry into fresh poultry food products. Remaining by-products are converted by two processes. Meat and viscera by-products (offal) are converted to meat meal and fat, and feathers and blood are converted to high protein feather meal.

There are two boilers at the poultry processing plant, four boilers at the by-product protein conversion plant, an ammonia refrigeration system, a wastewater treatment plant, and an emergency generator. House air odor is controlled by packed tower scrubbers while high intensity odor from processes is controlled by a DFS system that includes a venturi scrubber, a spray condenser, and a packed tower scrubber. The wastewater treatment plant has a lime silo with fabric filter.

The facility is a Title V major source of SO<sub>2</sub> and NO<sub>x</sub>. This source is located in an attainment area for all pollutants, and is a PSD major source of SO<sub>2</sub>. The facility has a New Source Review/ New Source Performance Standards permit dated August 3, 2007, which had undergone several amendments with the most recent one dated March 15, 2005. The latter was amended for the changes made to boiler ES7 after fire damage which have been determined as not meeting the definition of routine maintenance repair and replacement as well as not triggering NSPS Subpart Dc. There are combined annual emission limits for the boilers at the by-product protein conversion plant (ES 7, ES8, ES9, and ES10) and the emergency generator.

There is also a State Operating Permit dated January 23, 2006, for state-only-enforceable odor control requirements in accordance with Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution at 9 VAC 5-40-130 et seq. and 9 VAC 5-50-130 et seq. The SOP permit was to satisfy the requirements of the Consent Order dated March 3, 2003, which had been terminated on March 24, 2006.

## **II. COMPLIANCE STATUS**

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

### III. EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/ Rated Capacity*	Pollution Control Device Description	PCD ID	Pollutant Controlled	Applicable Permit Date
<b>Poultry Processing Plant (27,000 birds/hr maximum rated capacity)</b>							
ES1	EP1	Cleaver Brooks Boiler CB600, #6 fuel oil-fired, manufactured before 1971	29 million Btu/hr	-	-	-	-
ES2	EP2	Cleaver Brooks Boiler CB600, #6 fuel oil-fired, manufactured before 1971	29 million Btu/hr	-	-	-	-
ES5	EP5	Ammonia Refrigeration System, compressor room air exhaust	-	-	-	-	-
<b>Wastewater Treatment Plant</b>							
ES6	EP6	Bulk storage silo for dry lime	150 lbs/hr	Fabric Filter, C.P. Environmental-99-M57-405	CD6	PM	-
<b>By-Product Protein Conversion Plant (67.5 tons/hr maximum rated capacity)</b>							
ES7	EP7	Cleaver Brooks Boiler DL-68, #6 fuel oil-fired, manufactured before 1974	65 million Btu/hr	-	-	-	08/03/2007 NSR
ES9	EP9	Cleaver Brooks Boiler CB 800, #2 fuel oil/poultry fat-fired, manufactured in 1997 (NSPS Subpart Dc)	33.7 million Btu/hr	-	-	-	08/03/2007 NSR
ES10	EP10	Cleaver Brooks Boiler CB 800, #2 fuel oil/poultry fat-fired, manufactured in 1997 (NSPS Subpart Dc)	33.7 million Btu/hr	-	-	-	08/03/2007 NSR

Emission Unit ID	Stack ID	Emission Unit Description	Size/ Rated Capacity*	Pollution Control Device Description	PCD ID	Pollutant Controlled	Applicable Permit Date
ES8	EP8	Cleaver Brooks Boiler CB 750, #2 fuel oil/poultry fat-fired, manufactured in 1981	31.6 million Btu/hr	-	-	-	08/03/2007 NSR
ES11A	EP11 A	Protein Conversion Plant – House air	-	Packed tower scrubber, Millpoint	CD11A	Odor	08/03/2007 NSR and 01/23/2006 SOP
ES11B	EP11 B	Protein Conversion Plant – House air	-	Packed tower scrubber, Millpoint	CD11B	Odor	08/03/2007 NSR and 01/23/2006 SOP
ES12	EP12	Protein Conversion Plant – Production equipment with high intensity odor:		Millpoint, DFS-24 system: venturi, spray condenser, and packed tower scrubber in series	CD12	Odor	08/03/2007 NSR and 01/23/2006 SOP
		Feather Hydrolyser	30,000 lbs/hr raw feathers	-	-		
		Feather Hydrolyser	20,000 lbs/hr raw feathers	-	-		
		Feather Hydrolyser	10,000 lbs/hr raw feathers	-	-		
		Feather Dryer	30,000 lbs/hr feathers	-	-		
		Evaporators (Cookers)	97,000 lbs/hr	-	-		-
		Expellers/Presses	97,000 lbs/hr	-	-		-
General							
ES13	EP13	Diesel Generator for emergency use, 2005	2,593 hp; 1,825 kW	-	-	-	08/03/2007 NSR

\*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

## IV. EMISSIONS INVENTORY

A copy of the 2009 annual emission update is attached. Emissions are summarized in the following table.

2009 Actual Criteria Pollutant Emission in Tons/Year				
VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	NO <sub>x</sub>
0.4	7.7	164.0	12.5	61.8

## V. POULTRY PROCESSING PLANT BOILER REQUIREMENTS (EXISTING SOURCES) – EMISSION UNITS ES1 AND ES2

### A. Limitations

Boilers ES1 and ES2 are pre-1972, subject to the emission limits for existing sources in 9 VAC 5 Chapter 40. The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-20	Compliance for Existing Sources
9 VAC 5-40-80	Existing Source Standard for Visible Emissions
9 VAC 5-40-900	Existing Source Standard for Particulate Matter
9 VAC 5-40-930	Existing Source Standard for Sulfur Dioxide

### B. Monitoring

For periodic monitoring, the permit includes a requirement for weekly visual observation of each stack for opacity. If any opacity is indicated, corrective action shall be carried out to eliminate the opacity, or an EPA Method 9 visible emissions evaluation will be performed.

No periodic monitoring for PM or SO<sub>2</sub> is required in the permit. The following demonstration is provided to show that there is not a great likelihood that the emission limits will be exceeded:

Using: Emission factor for PM (AP-42, Table 1.3-5, 9/98) =  $8.34[1.12(S) + 0.37] = [9.34(S) + 3.09]$  lb/1000 gal  
 where S = weight percent of sulfur in the fuel  
 Heating Value of No.6 fuel oil = 150,000 Btu/gal  
 Maximum weight percent of sulfur = 2.5  
 Emission Unit ES1 = 29 MMBtu/hr  
 Emission Unit ES2 = 29 MMBtu/hr

Fuel consumption for ES1 and ES2, each =  $29 \text{ MMBtu/hr} / 150,000 \text{ Btu/gal} = 193.3 \text{ gal/hr}$   
 PM emissions from ES1 and ES2, each =  $[9.34(2.5) + 3.09] \text{ lb/1000 gal} \times 193.3 \text{ gal/hr} = 5.1 \text{ lbs/hr PM}$   
 Title V permitted rate = 7.8 lbs/hr PM

Using: Emission factor for SO<sub>2</sub> (AP-42, Table 1.3-1, 9/98) =  $157S$  lb/1000 gal  
 SO<sub>2</sub> emissions from ES1 and ES2, each =  $[(157)(2.5) \text{ lb/1000 gal}] \times 193.3 \text{ gal/hr} = 75.9 \text{ lbs/hr SO}_2$   
 Title V permitted rate = 76.6 lbs/hr SO<sub>2</sub>

### **C. Testing**

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

### **D. Recordkeeping**

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include fuel type, throughput and certifications, demonstration of compliance to the emission limits, and all visible emission observation and evaluations (EPA Method 9).

### **E. Reporting**

There is no specific reporting requirement.

### **F. Streamlined Requirements**

There are no streamlined requirements.

## **VI. EMERGENCY GENERATOR AND PROTEIN CONVERSION PLANT BOILER REQUIREMENTS – EMISSION UNITS ES7, ES8, ES9, ES10, AND ES13**

### **A. Limitations**

Diesel-fueled generator ES13 was initially permitted on 3/15/2005 for any use, the same as in the amended permit dated 8/03/07. The engine size of 1825 kW (2593 hp) is not exempt from minor NSR permitting even if the generator was limited to emergency use only. The permit limits operation to 407 equivalent full load (prime power) operating hours per year (Condition 3 of the 8/03/07 NSR) and the fuel sulfur content to 0.05% to meet presumptive BACT and to avoid PSD permitting. The generator is not subject to NSPS Subpart IIII due to its manufacture date earlier than 4/01/2006. As the MACT Subpart ZZZZ comes into effect and the generator has not been used for any purpose other than emergency, the facility decided to limit the generator to emergency-use only (letter request dated 9/27/10) so that only the reduced MACT requirements for existing emergency compression ignition (CI) stationary reciprocating internal combustion engines (RICE) at area sources are applicable. As the MACT does not limit hours of operation for emergency and allows up to 50 hours of operation for non-emergency purpose (40 CFR 63.40 CFR 63.6640(f)(1)(i) to (iii)), the operating hour limitation in Condition IV.A.1 is a combination of the 8/03/07 NSR permit Condition 3 and the MACT requirements. Operation and maintenance practice requirements from the MACT are added in Condition IV.A.17. Other limitations on diesel fuel (0.05% S), criteria pollutant emissions and visible emissions are carried over to the Title V permit from the NSR permit without change.

Boiler ES7 burns residual oil while boilers ES8, ES9, and ES10 burn distillate oil and poultry fat. Boilers ES9 and 10 are subject to NSPS Subpart Dc while boilers ES7 and ES8 predate the rule. However, ES7 was damaged in a fire in 2007 and its repair was determined not a NSPS modification and also not a routine maintenance, repair and replacement. Therefore, it is subject to Article 6 NSR permitting. The residual oil throughput limit (Condition IV.A.3), 0.5% sulfur limit (Condition IV.A.4), and emission limits (Condition IV.A.10) for ES7 were to avoid PSD permitting requirements. This modification of the boiler following an accidental fire is not a planned project nor related to the installation of generator ES13 as permitted on 3/15/10 (see discussion below); hence, the contemporaneous period is not an issue. Note that each of the other boilers and the generator ES13 have hourly emission limits but no annual emission limits or throughput limits from the NSR; the combined annual emission limits in Condition IV.A.12 cover all four boilers of the protein conversion plant and the generator to allow operational flexibility except for the specific limitations applicable to boiler ES7 and generator ES13.

Visible emission limits for each of the boilers meeting the applicable NSPS or the presumptive state BACT are carried over from the 8/03/07 NSR to the Title V permit (Conditions IV.A.13 through 16).

The Maintenance/Operating Procedures condition IV.A.18 is a combination of conditions 19 and 26 of the 8/03/07 NSR. Condition 26 is a General Condition in the NSR but it has no equivalent in the General Condition section of the Title V permit. Similarly, General Condition 29 of the 8/03/07 NSR is carried over as Condition IV.A.20.

## **B. Monitoring**

The MACT Subpart ZZZZ requirement of the installation of a non-resettable hour meter (40 CFR 63.6625(f)) for generator ES13 is shown in Condition IV.B.1. The operation and maintenance practice requirements by the MACT in Condition IV.A.17 ensure continuous compliance with other limitations.

For periodic monitoring of boilers, weekly visual observations for opacity are required for each boiler stack. If any opacity is indicated, the opacity condition shall be corrected, or an EPA Method 9 visible emissions evaluation will be performed.

## **C. Testing**

Test port shall be provided at the appropriate locations and additional stack testing and visible emission evaluations shall be conducted as necessary to demonstrate compliance with an emission limit or standard in accordance with Conditions IV.C.2 and 3 as carried over from Conditions 20 and 21 of the 8/03/07 permit.

## **D. Recordkeeping and Reporting**

Required records from Condition 22 of the 8/03/07 NSR are carried over. Note that the monthly emission calculations are required to demonstrate compliance with the combined emission limits in Condition IV.A.12. In addition, records of operation and maintenance for the emergency generator in accordance with MACT Subpart ZZZZ, written operating procedures and maintenance schedule as required by Condition IV.A.17 and 18, and all visible emission observations and visible emission evaluations (EPA Method 9) are required.

Semi-annual reports for boilers ES9 and ES10 are required by NSPS Subpart Dc at 40 CFR 60.48c (j).

## **E. Streamlined Requirements**

There are no streamlined requirements.

## **VII. WASTEWATER TREATMENT PLANT AND PROTEIN CONVERSION PLANT PROCESS EQUIPMENT REQUIREMENTS - EMISSION UNITS ES6, ES11A AND B, AND ES12**

### **A. Limitations**

The 8/03/07 NSR has no applicable requirements to the wastewater treatment plant and protein conversion plant process equipment such as feather hydrolyzers, dryer, evaporators.

The wastewater treatment plant has a lime silo (Unit ES6) with fabric filter. The standards for particulate matter in 9 VAC 5-40-260 applies with the allowable emission rates calculated from the process weight rate (9 VAC 5-40-22 C) as described in Condition V.A.1.

Even though there are potential particulate emissions from process equipment, they are small; the main concern is odor. House air odor from the process buildings is controlled by two parallel systems (ES11 A and B), each with a packed tower scrubber. High intensity odor from process equipment is controlled by a system (ES12) consisting of a venturi, a spray condenser, and a packed tower scrubber connected in series. As the odor regulations are state-only enforceable (9 VAC 5-40-130 et seq. and 9 VAC 5-50-130 et seq.), the facility's SOP dated 1/23/06 that addresses odor control will be discussed under Section IX. State-Only Applicable Requirements.

Visible emission standards of 9 VAC 5-50-80 are also applicable as shown in Condition V.A.2.

### **B. Monitoring**

The permittee shall determine the allowable particulate emission standards based on process weight rate. Exceedance of the applicable emission limits is not likely because the emissions are controlled by fabric filter for the case of the lime silo (ES6) and by scrubber systems for the case of the house air (ES11 A and 11B) and process equipment (ES12).

CAM is not applicable because the pre-controlled particulate emissions are less than the major source levels. This can be illustrated for the lime silo, using the PM emission factor of 0.72 lbs/ton for uncontrolled cement uploading to elevated storage silo from AP-42 (Table 11.12-2, 6/06), or the more conservative allowable PM emission rate from 9 VAC 5-40-260:

$$0.72 \text{ lbs/ton} \times 143 \text{ lbs/hr} \times 1 \text{ ton}/2000 \text{ lbs} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 0.24 \text{ tons/yr}$$

or

$$E = 4.10P^{0.67} = 4.1 \times (143/2000)^{0.67} = 0.70 \text{ lbs/hr}$$

where:

$E$  = emission rate in lb/hr

$P$  = process weight rate in tons/hr

$$0.70 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.1 \text{ tons/yr}$$

Compliance to visible emission limits is monitored by weekly visual observations for opacity for each process stack/vent. If any opacity is indicated, the opacity condition shall be corrected, or an EPA Method 9 visible emissions evaluation will be performed.

### **C. Testing**

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

#### **D. Recordkeeping**

Records are required for emission limit determinations from process weight rates and all visible emission observations and visible emission evaluations (EPA Method 9).

#### **E. Streamlined Requirements**

There are no streamlined requirements.

### **VIII. GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

#### **Comments on General Conditions**

##### **1. Condition B. Permit Expiration**

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 3-2006”.

This general condition cites the Article that follows:

Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9 VAC 5-80-80. Application

9 VAC 5-80-140. Permit Shield

9 VAC 5-80-150. Action on Permit Applications

##### **2. Condition F. Failure/Malfunction Reporting**

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

##### **3. Condition J. Permit Modification**

This general condition cites the sections that follow:

9 VAC 5-80-50. Applicability, Federal Operating Permit for Stationary Sources

9 VAC 5-80-190. Changes to Permits

9 VAC 5-80-260. Enforcement

9 VAC 5-80-1100. Applicability, Permits for New and Modified Stationary Sources

9 VAC 5-80-1790. Applicability, Permits for Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas

9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

4. Condition U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:

9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction

9 VAC 5-80-110. Permit Content

5. Condition Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains citations from the Code of Federal Regulations that follow:

40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.

40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.

40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:

9 VAC 5-60-70. Designated Emissions Standards

9 VAC 5-80-110. Permit Content

## **IX. STATE ONLY APPLICABLE REQUIREMENTS**

State standards on toxic pollutant emissions (9 VAC 5-60-200 et seq. and 9 VAC 5-60-300 et seq.) and odorous emissions (9 VAC 5-40-130 et seq. and 9 VAC 5-50-130 et seq.) are identified as applicable to the facility.

Additionally, the facility's 1/23/2006 SOP, originated from the requirements of the Consent Order (dated 3/03/2003, terminated 3/24/06), has specific requirements on odor control that are only enforceable by Commonwealth of Virginia State Air Pollution Control Board and its designees. The following are addressed in the SOP:

The By-product Protein Conversion Plant (commonly called the Rendering Plant) Operation,  
Raw Material Handling,  
Wastewater Treatment Plant Operation,  
Emergency Response Plan,  
Facility-wide Conditions, and  
Records

Two documents that were also required by the Consent Order, the Odor Control and Monitoring Plan and the Odor Control System Operation and Maintenance Manual, both dated July 2005, form the basis of the corrective action to eliminate odor, and are referred to by almost every condition in the SOP. Operating procedures, emission controls for house air odor (ES11A and 11B system) and high intensity odor from process equipment (ES12 system), monitoring and recordkeeping were included. The Facility-Wide Conditions section also addresses operator training, and odor complaint investigations. Records of operation and monitoring results, maintenance, and operator training are required to be available for inspection and current for the most recent 5 years.

## **X. FUTURE APPLICABLE REQUIREMENTS**

No future applicable requirements have been identified.

## **XI. INAPPLICABLE REQUIREMENTS**

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 4 cannot be included in any Title V permit (see Condition III.A.3). This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

The following have also been identified as inapplicable requirements.

Citation	Title of Citation	Description of Applicability
40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial- Commercial-Institutional Steam generating Units	Units ES1, ES2, ES7, and ES8 were installed prior to 6/9/1989, the applicability date of the NSPS.
40 CFR 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE)	This subpart applies to new CI ICE that was ordered after July 11, 2005, and manufactured after April 1, 2006; or CI ICE that was modified or reconstructed after July 11, 2005. Unit ES13 at the facility was ordered and manufactured earlier in 2005 (original permit date 3/15/05).

## **XII. INSIGNIFICANT EMISSION UNITS**

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
ES3, ES4, and three others	Five (5) Feather Singers using LPG, 4.4 MMBTU/hr combined	9 VAC 5-80-720 B	PM/PM-10, NOx	
N/A	Protein meal load-outs	9 VAC 5-80-720 B.1	PM/PM-10	

<sup>1</sup>The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

The facility has five feather singers using LPG with a combined heat input capacity below the insignificant level in 9 VAC 5-80-720 C.

Protein meal load-outs to trucks are inside building, hence, emissions are insignificant.

## **XIII. CONFIDENTIAL INFORMATION**

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

## **XIV. PUBLIC PARTICIPATION**

The proposed permit will be placed on public notice in the Eastern Shore News from Saturday, December 18, 2010 to Tuesday, January 18, 2011.